

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	
THOMAS WILLIAM GERHOLD	:	CASE NO. 1-19-bk-03204-HWV
aka TOM GERHOLD	:	
Debtor	:	
	:	CHAPTER 13
LAKEVIEW LOAN SERVICING, LLC	:	
Movant	:	
	:	
v.	:	
	:	
THOMAS WILLIAM GERHOLD	:	
aka TOM GERHOLD	:	
Respondent	:	

**DEBTOR'S RESPONSE TO MOTION OF
LAKEVIEW LOAN SERVICING, LLC
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, comes Debtor, Thomas William Gerhold, by and through his attorney, Gary J.

Imblum, and respectfully responds as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted in part and denied in part. Debtor has no knowledge as to who is the valid holder of the mortgage. Strict proof is demanded.
5. Admitted.
6. Admitted. Further, Debtor made a payment of \$1,400.00 on February 18, 2022 and a payment of \$800.00 on March 2, 2022. In addition, Debtor delivered to Debtor's counsel a payment of \$1,100.00 on March 2, 2022. Debtor can be current, including the March 2022 payment, by the end of March 2022.

7. Admitted in part and denied in part. See response to paragraph 6.

8. Denied. As of July 30, 2019, the real estate was worth \$195,000.00 in accordance with the market analysis. At that time the amount owed on the mortgage was \$163,283.09 pursuant to Lakeview's Proof of Claim. The balance owed to Lakeview has been paid down substantially in the last two and one-half years. In addition, during that time, property values have increased significantly. Accordingly, there is a significant equity cushion providing adequate protection to Lakeview. Further, Debtor has been making payments at least through November 2021. Debtor will make an offer in the near future to bring the missed payments current.

9. Denied. Any and all fees charged pursuant to the Motion for Relief will be resolved as part of this proceeding.

WHEREFORE, Debtor respectfully requests that this Honorable Court issue an Order denying the Motion for Relief From Stay.

Respectfully submitted,



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DATED: 3/11/2022

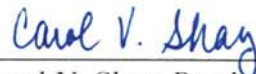
CERTIFICATION OF SERVICE

I, Carol V. Shay, Paralegal, do hereby certify that I have served a copy of the foregoing DEBTOR'S RESPONSE TO MOTION OF LAKEVIEW LOAN SERVICING, LLC FOR RELIEF FROM THE AUTOMATIC STAY upon the following persons by E-Service or by United States Mail, first class, postage prepaid, at Harrisburg, Dauphin County, Pennsylvania, addressed to:

JACK N. ZAHAROPOULOS, ESQUIRE
CHAPTER 13 TRUSTEE
VIA E-SERVICE

REBECCA A. SOLARZ, ESQUIRE
KML LAW GROUP, P.C.
COUNSEL FOR MOVANT
VIA E-SERVICE

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DATED: 3/11/2022